## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA

## Alexandria Division

UNITED STATES OF AMERICA	
v.	No. 1:24-MJ-36
RUSSEL GUYE DADZIE,	
Defendant.	

## AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT AND ARREST WARRANT

I, Ryan Azmoudeh, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

1. I am a Special Agent with Homeland Security Investigations (HSI) and have been since August 2020. Currently, I am assigned to the Washington Field Office, where I am responsible for conducting and assisting in investigations involving violations of Federal Law. I have gained experience through training with HSI and in my everyday work related to conducting investigations into suspected violations of Federal Law. During my career as an HSI agent, I have (a) participated in the execution of search warrants and arrest warrants for various crimes; (b) reviewed and analyzed numerous recorded conversations and other documentation of criminal activity; (c) interviewed victims and suspects of criminal investigations; and (d) conducted physical surveillance of individuals engaged in various crimes. Moreover, I am a federal law enforcement officer who is engaged in enforcing the criminal laws.

- 2. This affidavit is submitted in support of a criminal complaint and arrest warrant charging that between September of 2023 and October 15, 2023 RUSSEL DADZIE did impersonate an Officer or Employee of the United States in violation of 18 U.S.C. § 912.
- 3. The facts and information contained in this affidavit are based upon my training and experience, personal knowledge, and observations during the course of this investigation, as well as the observations of other law enforcement involved in this investigation. This affidavit contains information necessary to support probable cause, and it is not intended to include each, and every fact and matter observed by me or known to the government.

## PROBABLE CAUSE

- 4. On or about September 15, 2023, I received information from Prince William County Police Department (PWCPD) that Russel DADZIE was impersonating a DHS Federal Law Enforcement Officer (FEDLEO) within Prince William County for the suspected purpose of dissuading law enforcement from investigating DADZIE and his accomplices during routine police encounters.
- 5. When I received information that PWCPD suspected DADZIE of impersonating a FEDLEO, I conducted records checks into law enforcement databases as well as contacted the Department of Homeland Security (DHS) Office of Inspector General (OIG). Based on the information provided to me by law enforcement database checks and DHS OIG, I determined that DADZIE is not a DHS officer or federal agent.
- 6. I determined that DADZIE is an armed Protective Security Officer with a third-party company contracted by DHS to provide armed security at a DHS location within the Washington, D.C. area. Based on my training and experience as well as information provided to me by DHS OIG, this position does not bestow any law enforcement

- authority, nor does it bestow any official title to be associated with the Federal Government to include, but not be limited to, officer, agent, or employee.
- 7. On September 15, 2023, at approximately 1:50 a.m., DADZIE was encountered by PWCPD during a consensual encounter at a Shell gas station located at 13801 Richmond Hwy, Woodbridge, VA. During the consensual encounter DADZIE was stopped in his personally owned vehicle (POV) and stated numerous times that he is "with DHS," is a "DHS Officer," and is a "Federal Officer." At one point during the encounter, DADZIE revealed what appears to be a Personal Identity Verification (PIV) credential in lieu of a driver's license, in an attempt to bolster his claims that he was a Federal Officer.
- 8. At one point during this encounter, PWCPD asked if there is anything illegal in the car to which DADZIE implied that there was nothing illegal in the car due to the fact that he is a Federal Officer. PWCPD was able to identify one of the occupants of DADZIE's car as a known criminal target suspected of being associated with narcotics and human trafficking within Prince William County.
- 9. On October 15, 2023, DADZIE was encountered by PWCPD outside of his home located in Woodbridge, VA during an investigation into a suspected larceny. During the encounter, DADZIE could be heard clearly stating that he "works for the feds" and further stating "I work for DHS."
- 10. As PWCPD was conducting their investigation into the suspected larceny, DADZIE stated "obviously you are accusing a Federal Officer of stealing" to which PWCPD responded "so you are a Federal Officer?" to which DADZIE replied, "damn right I am!" PWCPD then asked DADZIE to display credentials proving he was a Federal Officer. DADZIE responded by conceding that he was a DHS contractor. Later in the encounter,

DADZIE stated that he is a "Federal employee" and implied that PWCPD officers could not make allegations that he is involved in the suspected larceny because of his asserted position as a Federal employee.

11. Based on the foregoing, I submit there is probable cause to believe that Russel DADZIE did impersonate an Officer or Employee of the United States in violation of 18 U.S. Code § 912, in various locations within Prince William County, within the Eastern District of Virginia.

> RYAN D AZMOUDEH Date: 2024.01.30 12:00:08 -05'00'

Digitally signed by RYAN D AZMOUDEH

Ryan Azmoudeh Special Agent Homeland Security Investigations

Subscribed and sworn to before me This 1st day of February, 2024

Lindsey R Vaala

Honorable Lindsey R. Vaala United States Magistrate Judge Alexandria, Virginia

Digitally signed by Lindsey R Vaala Date: 2024.02.01 11:52:33 -05'00'